

1 ESTELA O. PINO, SBN 112975
2 **PINO & ASSOCIATES**
3 1520 Eureka Rd., Suite 101
Roseville, CA 95661
Telephone: (916) 641-2288

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5 Attorneys for the Plaintiffs' Executive Committee appointed by the Superior Court of the State
of California, in and for the County of Alameda, in Case No. RG16843631 and related cases.

6
7 THE UNITED STATES BANKRUPTCY COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
8 SAN FRANCISCO DIVISION

9 In re:

10 **PG&E CORPORATION,**

11 -and-

12 In re:

13 **PACIFIC GAS AND ELECTRIC**
14 **COMPANY,**

15 Debtors.

- 16 ☐ Affects PG&E Corporation
17 ☐ Affects Pacific Gas and Electric
Company
18 ☒ Affects both Debtors

19 * All papers shall be filed in the lead case,
20 No. 19-30088(DM)

Case No.: 19-30088 (DM)

Chapter 11

**RESERVATION OF RIGHTS RE:
DEBTORS' MOTION PURSUANT TO 11
U.S.C. 363(B) AND 105(A) AND FED. R.
BANKR. P. 6004 AND 9019 FOR ENTRY
OF AN ORDER (I) APPROVING AND
AUTHORIZING THE DEBTORS TO
ENTER INTO RESTRUCTURING
SUPPORT AGREEMENT WITH
CONSENTING NOTEHOLDERS AND
SHAREHOLDER PROPONENTS, AND (II)
GRANTING RELATED RELIEF.**

DATE: February 4, 2020
TIME: 10:00 A.M.
PLACE: United States Bankruptcy
Court
Courtroom 17, 16th Floor,
450 Golden Gate Avenue,
San Francisco, Ca 94102

JUDGE: Hon. Dennis Montali

RELATED DOCKET NO.: 5519

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24 The Plaintiffs' Executive Committee appointed by the Superior Court of the State of
25 California, in and for the County of Alameda, in Case No. RG16843631 and related cases
26 ("hereinafter referred to as the "Ghost Ship Executive Committee"), party in interest in the
27 above-referenced Chapter 11 cases, by and through its attorneys of record, hereby submits
28 the following reservation of rights in connection with the Debtors' Motion Pursuant to 11

1 U.S.C. 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order (I)
2 Approving and Authorizing the Debtors to Enter into Restructuring Support Agreement with
3 Consenting Noteholders and Shareholder Proponents, and (II) Granting Related Relief
4 (hereinafter referred to as the "Noteholders RSA Motion") (Docket No. 5519).

5 The Ghost Ship Executive Committee does not oppose the approval of the
6 Noteholders RSA Motion.

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8 On Friday, January 31, 2020, at approximately 8:42 P.M., however, the Debtors filed
9 the Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated
10 January 31, 2020 (hereinafter referred to as the "Amended Chapter 11 Plan") (Docket No.
11 5590).

12 Given the timing of the filing of the Amended Chapter 11 Plan, the Ghost Ship
13 Executive Committee has not had sufficient time to review and properly analyze the
14 Amended Chapter 11 Plan and whether the Amended Chapter 11 Plan can be confirmed.
15 Accordingly, out of abundance of caution, the Ghost Ship Executive Committee does
16 hereby inform the Court and other parties in interest that its lack of opposition to the
17 Noteholders RSA Motion does not constitute its acquiescence in and/or support for the
18 Amended Chapter 11 Plan, as currently constituted or as further amended, or any motion,
19 contested matter, and/or Disclosure Statement contemplated by the Restructuring Support
20 Agreement with Consenting Noteholders and Shareholder Proponents (hereinafter referred
21 to as the "Noteholders RSA").

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1 Accordingly, the Ghost Ship Executive Committee reserves all of its rights with
2 respect to the Amended Chapter 11 Plan, as currently constituted or as further amended;
3 or any motion, contested matter, and/or Disclosure Statement contemplated by the
4 Noteholders RSA.

5 Dated: February 3, 2020

Respectfully submitted,
6 PINO & ASSOCIATES

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8 By: /s/ Estela O. Pino
9 Estela O. Pino, Attorneys for the Ghost Ship
Warehouse Plaintiffs' Executive Committee
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